

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Crim. No.
)	
v.)	26 U.S.C. § 7206(1)
)	(Filing False Tax Returns)
DANIEL TUNNELL,)	
)	
Defendant)	
)	

05 CR 10168 DPW

INFORMATION

The United States Attorney charges:

1. From approximately April, 2001 through July, 2002, DANIEL TUNNELL was the regional vice president in charge of the Framingham, Massachusetts office of Computer Associates, Inc.
2. In 2001 and 2002, TUNNELL asked approximately eight Computer Associates employees whom he supervised to share with him a portion of their sales commissions. The employees agreed and gave TUNNELL shared commissions totaling approximately \$51,063 in 2001 and \$20,109 in 2002.
3. TUNNELL knew that the shared commissions he received constituted income for him. Nonetheless, he did not report them as income on the 2001 and 2002 income tax returns he filed. The income figures he did list on these returns were therefore false.
4. By filing false tax returns, TUNNELL reduced his income tax payments for both 2001 and 2002.

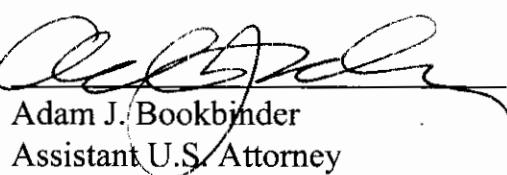
COUNT ONE
(Filing False Tax Returns)
26 U.S.C. § 7206(1)

4. On or about April 14, 2002, TUNNELL did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the calendar year 2001, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service. TUNNELL did not believe this tax return to be true and correct as to every material matter, in that it did not include as income \$51,063 in commissions that TUNNELL knew he had received from other Computer Associates employees.

All in violation of 26 U.S.C. § 7206(1).

MICHAEL J. SULLIVAN
United States Attorney

By:



Adam J. Bookbinder
Assistant U.S. Attorney

Dated: July 6, 2005

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. III Investigating Agency POSTAL, IRS

City Framingham

Related Case Information:

County Middlesex

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:

Defendant Name Daniel TunnellJuvenile Yes No

Alias Name _____

Address 4251 Potters Walk NE, Atlanta, Georgia 30342Birth date (Year only): 1973 SSN (last 4 #): 2973 Sex M Race: Caucasian Nationality: U.S.Defense Counsel if known: Mark Pearlstein Address: McDermott Will & Emery
28 State St., Boston, MA 02109

Bar Number: _____

U.S. Attorney Information:

AUSA Adam Bookbinder Bar Number if applicable 566590Interpreter: Yes No List language and/or dialect: _____Matter to be SEALED: Yes No Warrant Requested Regular Process In Custody

Location Status:

Arrest Date: _____

 Already in Federal Custody as _____ in _____. Already in State Custody _____ Serving Sentence Awaiting Trial On Pretrial Release: Ordered by _____ on _____Charging Document: Complaint Information IndictmentTotal # of Counts: Petty _____ Misdemeanor _____ Felony 1 _____

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: July 6, 2005

Signature of AUSA 

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Daniel Tunnell

U.S.C. Citations

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1 <u>26 U.S.C. § 7206(1)</u>	<u>Filing False Tax Return</u>	<u>1</u>
Set 2 _____	_____	_____
Set 3 _____	_____	_____
Set 4 _____	_____	_____
Set 5 _____	_____	_____
Set 6 _____	_____	_____
Set 7 _____	_____	_____
Set 8 _____	_____	_____
Set 9 _____	_____	_____
Set 10 _____	_____	_____
Set 11 _____	_____	_____
Set 12 _____	_____	_____
Set 13 _____	_____	_____
Set 14 _____	_____	_____
Set 15 _____	_____	_____

ADDITIONAL INFORMATION: